

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.2 State the length of time necessary for Verizon to construct each and every fiber meet point arrangement identified in Verizon's response to data request 1.1.

REPLY: Verizon objects to this Information Request on the grounds that information responsive to this request is not readily available and would require a burdensome special study.

Without waiving its objections, Verizon states that the requested information is not tracked in any centralized system or database (or other format) that would enable Verizon to provide a full reply. In an effort to be as responsive as reasonably possible, Verizon notes that it would expect the time frames to construct fiber meet point arrangements similar to those already deployed in Massachusetts would range from about nine weeks to about 20 weeks.

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Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.3 Identify and describe the discrete steps involved in establishing the fiber meet point arrangements that are identified in the response to data request 1.1, and state the length of time necessary to complete each arrangement. Include in this response the time necessary to hold the initial implementation meeting with the other party, the time necessary to build each and every component of the fiber meet point arrangement, and the time required of every other step of the implementation and construction process.

REPLY: Verizon objects to this Information Request on the grounds that information responsive to this request is not readily available and would require a burdensome special study.

Without waiving its objections, Verizon states that the requested information is not tracked in any centralized system or database (or other format) that would enable Verizon to provide a full reply. In an effort to be as responsive as reasonably possible, below is an outline of major tasks and estimated time frames generally required to complete a fiber meet arrangement.

Fiber Meet Point Arrangement Process (9 – 20 Weeks):

1. Communicate Intention (Initial Meetings) (2-4 Weeks)
 - a. CLEC Contacts Verizon Account Manager
 - b. CLEC fills out fiber meet questionnaire
 - c. Customer Network Engineering Outlines Scope of Job

ITEM: Charter 1.3

REPLY: Cont'd

2. Agree on Terms (1-2 Weeks)
 - a. Technical Specifications
 - i. Physical Location(s)
 - ii. Equipment
 - iii. Firmware Versions
3. Design (3-4 weeks)
 - a. Outside Plant (96 Hours)
 - i. Planning
 1. Fiber availability/Assignment
 2. System work
 - ii. Detail
 1. Secure rights of way
 2. Permitting
 3. Traffic studies
 4. Fiber cable layouts
 5. Order Materials & Equipment
 - b. IOF and CO (48 Hours)
 - i. Planning
 1. Equipment Availability
 - a. Bays
 - b. DSX
 - c. DS3X
 - d. Multiplexer
 - e. FDF
 2. Order Materials & Equipment
 - ii. Design
 1. Detail Fiber/Coax layout
 2. Assign DS3s
 3. Assign DS1s
 - iii. Center Engineering
 1. Procurement
 2. Warehouse Staging
4. Build (2-8 Weeks)
 - a. OSP (200 Hours)
 - i. Schedule Work
 - ii. Permits
 - iii. Police details
 - iv. Order equipment
 - v. Traffic control

ITEM: Charter 1.3

REPLY: Cont'd

- vi. Pump manholes
- vii. Clean manholes
- viii. Place Conduit
- ix. Place inner duct
- x. Rod and Rope Conduit
- xi. Place cable
- xii. Splice cable
- xiii. Test Cable

b. ISP (EI – Equipment Engineering) (160 Hours)

- i. Schedule Work
- ii. Install Fiber jumpers
- iii. Install Coaxial cable
- iv. Miscellaneous wiring
- v. Install Multiplexer
- vi. Install FDF
- vii. Install DSX
- viii. Test System

5. Provision (1-2 Weeks)

- a. E1 database
- b. CATC (Customer Account Team Center)
- c. CPC (Circuit Provisioning Center) Builds Circuit Detail
- d. COOPS WFA (Work Force Assignment) & Network Provisioning Center Turn Up system

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DATED: August 4, 2006

ITEM: Charter 1.6 Identify and describe the discrete steps involved in establishing the fiber meet point arrangements with Charter that are identified in the response to data request 1.4 and 1.5, and state the length of time necessary to complete each arrangement. Include in this response the time necessary to hold the initial implementation meeting with Charter, the time necessary to build each and every component of the fiber meet point arrangement, and the time required of every other step of the implementation and construction process.

REPLY: Verizon objects to this request to the extent it seeks information that is not relevant to this proceeding and therefore not reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects to this Information Request on the grounds that information on fiber meet arrangements in any state other than Massachusetts is beyond the jurisdiction of the Department and is not relevant to this proceeding. Verizon also objects on the grounds that the requested information is already in Charter's possession.

Notwithstanding these objections, please see Verizon's reply to Charter 1.3.

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REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.18 Identify and describe the specific equipment that Verizon expects to use in the fiber meet point arrangements with Charter that are the subject of this proceeding. Include in such description the specific component parts and equipment of any applicable fiber meet point arrangement, including fiber optic terminals, OC3 cards, fiber NIDs, add / drop multiplexing equipment, and fiber optic cables.

REPLY: Assuming Verizon and Charter agree to establish a fiber meet point arrangement in Massachusetts, Verizon would likely install the equipment listed below. Verizon retains the right to substitute any equipment as it deems appropriate.

Basic Equipment That May Be Needed (Depends on specific fiber meet point configuration)

FNID - Fiber Network Interface Device

AFL Telecommunications
LightLink LL-470 Fiber optic Demarcation
Adapter Panel w 6 SC/UPC Kit of 6
SC/APC Pigtail Kit

SONET Compatible – Add/Drop Multiplexer

Fujitsu
FLASHWAVE 4500
Hardware
Common Cards
OC3 Cards
Service Interface Cards
Software & RTU

ITEM: Charter 1.18

REPLY: Cont'd

LGX Panel

SECR (Corning)

72 FIBER SC CONN, RIBBON 125' LONG

DSX Panel

ADC

BEST-56C PANEL

DS3X Panel

ADC

DSX-4B-24-7A

Miscellaneous

SECR (Corning)

FIBER JUMPER SM DUPLX SCUPC-SCUPC 17M (52ft.)

American Cable Assemblies

Coaxial Cable

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ITEM: Charter 1.19 State with specificity the actual cost to Verizon of the equipment identified in Verizon's response to data request 1.18. Include in this response an explanation of the basis for determining the "cost" of each component identified in the response.

REPLY: Verizon objects to this Information Request on the grounds that the request seeks information that is not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, the requested information is proprietary, confidential and competitively sensitive and will be furnished to parties other than the Department only in accordance with the terms of a fully executed protective agreement.

Without waiving its objection, Verizon states please see the attached proprietary response.

ITEM: Charter 1.19
REPLY: Cont'd

Begin Proprietary

End Proprietary

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ITEM: Charter 1.20 For each piece of equipment identified in Verizon's response to data request 1.18 identify the vendor(s) or equipment maker(s) from whom Verizon purchases such equipment.

REPLY: Verizon objects to this Information Request on the grounds that the request seeks information that is not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects on the grounds that the request seeks proprietary, confidential and competitively sensitive information.

Notwithstanding its objections, please see Verizon's reply to Charter 1.18.

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DATED: August 4, 2006

ITEM: Charter 1.22 Identify and describe Verizon's specific costs of engineering, labor, and construction of the fiber meet point arrangements with Charter that are the subject of this proceeding. Separate and segregate Verizon's costs for each component of work described in this data request (i.e. engineering costs, labor costs, and construction costs should all be identified separately).

REPLY: Verizon objects to this Information Request on the grounds that the request seeks information that is not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, the requested information is proprietary, confidential and competitively sensitive and will be furnished to parties other than the Department only in accordance with the terms of a fully executed protective agreement.

Without waiving its objection, Verizon states please see the following response and proprietary attachment.

ITEM: Charter 1.22 In general terms the costs associated with Engineering, Construction and Labor are as follows:
REPLY: Cont'd

Engineering & Provisioning:

These are primarily the costs associated with Planning, Detail Design, Procurement, and Provisioning of the fiber meet arrangement. These include both internal (Verizon employee(s)) and external (Contract Engineering) costs. Engineering costs also include the costs of the design and provisioning systems the engineers use as tools to track and communicate the request, plan and create the planning documents and engineering work orders, inventory the assets, and provision and assign the working fiber meet system.

Construction:

Construction costs *include* labor costs as well as any ancillary contract costs that may be required, like trenching, paving, traffic control, traffic studies, environmental impact statements, police details, environmental cleanup costs (contaminated manholes), restoration costs (landscaping), permitting, rights of way, etc. Labor costs are primarily the costs associated with physical building of the fiber meet arrangement (Technicians – Line, Splice, Equipment, System, Clerical etc.) as well as the systems to manage that labor force. Construction costs also include all material costs required for the fiber meet arrangement, including, but not limited, to the items listed in Verizon's response 1.19, as well as all miscellaneous material (e.g., through bolts, strand, anchors, guys, ground wire, environmental pillows, etc.) and the cost of managing those materials (transport, systems, warehousing).

ITEM: Charter 1.22
REPLY: Cont'd

Begin Proprietary

End Proprietary

VZ #22